

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

GEORGE MCCALL	)	
	)	
Plaintiff	)	CASE NO. 1:21-CV-902
	)	
VS	)	JUDGE: GAUGHAN
	)	
FRONTIER AIRLINES, INC., ET AL.	)	<b>PLAINTIFF'S</b>
	)	<b>INITIAL DISCLOSURES</b>
Defendants	)	
	)	
	)	

NOW COMES Plaintiff, by and through Counsel, and respectfully provides his Initial Disclosures as follows:

- Plaintiff has not yet decided which witnesses that he may call to testify at trial, and may not have identified all witnesses who may have information about this litigation.  
However, the following witnesses may have discoverable information. By identifying these witnesses, Plaintiff does not represent that he has control over producing them to testify, nor does Plaintiff make any representation about the content, scope or relevancy of their knowledge:
  - Managers, Supervisors & On-duty Employees of the Defendants “captioned” in the complaint shall be called to testify. Plaintiff is seeking “eyewitness” testimony to affirm the loss of his property and the policy / procedure that was followed during the storage & search of his luggage.
- Based upon the reasonably available information, Plaintiff believes that the following documents and tangible things may be relevant to the claims in this litigation:
  - Surveillance video

- Loss, claims, investigative reports and / or incident data
- Policy / procedure records
- Damages (compensatory) shall be based on the value of the property that was lost.

Plaintiff is also seeking reimbursement of his filing fee (approx. \$300.00) and reasonable attorney fees (TBD). Non-economic damages to be determined by the trier-of fact

- Exhibits to be used at trial include but are not limited to the Complaint & attached exhibits, and all other evidence obtained during the Discovery phase.

**Respectfully submitted,**

/S/ ANTHONY BAKER

---

Anthony Baker 0084620  
Attorney for Plaintiffs  
5425 Detroit Road, Suite 10  
Sheffield Village, Ohio 44054  
Tel 440-596-9876  
Fax 440-934-0712

**PROOF OF SERVICE**

Plaintiff hereby confirms service of the foregoing FILING was served upon Defendants' Counsels of Record by EMAIL on July 15, 2021.

/S/ ANTHONY BAKER

---

Anthony Baker  
Attorney for Plaintiff